

ID: CCA-224840-12

Number: **201221020**

Office:

Release Date: 5/25/2012

UILC: 6662A.00-00

From:

Sent: Friday, February 24, 2012 8:40 AM

To:

Cc:

Subject: FW: 6662A questions

The answer is in the flush language of section 6662A(b)(1), which says " For purposes of subparagraph (A), any reduction of the excess of deductions allowed for the taxable year over gross income for such year, and any reduction in the amount of capital losses which would (without regard to section 1211) be allowed for such year, shall be treated as an increase in taxable income."

Let me know if this doesn't answer your question.